

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

IAN HUNTER LUCAS, Pro Se

Plaintiff(s),

v.

MARY ANN JESSEE et al.,

Defendant(s).

Case No. 3:24-cv-00440

Judge Waverly D. Crenshaw, Jr
Magistrate Judge Jeffery S. Frensley

MOTION TO FILE UNDER SEAL AND FOR IN CAMERA REVIEW

The Plaintiff, Ian Hunter Lucas, proceeding pro se, respectfully moves this Court for permission to file a motion under seal and requests an in-camera review of specific documents. This motion is grounded in the provisions of the relevant rules of the 6th Circuit.

Legal Basis for Motion to Seal:

1. Strong Presumption of Openness: - The Plaintiff acknowledges the strong presumption in favor of openness concerning court records. To overcome this presumption, the Plaintiff must provide compelling reasons for non-disclosure. This includes offering an adequate and specific explanation for why the brief should be sealed and detailing the specific harm that will occur if the brief is not sealed.

2. Compelling Reasons for Sealing: - In accordance with 6th Circuit Rule 28(d), the Plaintiff will ensure that the motion to seal is narrowly tailored to serve the compelling reasons for sealing. This aligns with precedents such as United States v. Turner, 2013 U.S. App. LEXIS 8146, and United States v. Woods, 2013 U.S. App. LEXIS 14850.

Request for In Camera Review:

1. Evidence to Support in Camera Review: - The Plaintiff understands that the 6th Circuit encourages the use of in camera reviews sparingly. To justify this request, the Plaintiff will present evidence sufficient to support a reasonable belief that such a review might yield evidence establishing the exception's applicability.


2. Avoiding Unsubstantiated Allegations: - The Plaintiff will avoid making unsubstantiated allegations of a criminal purpose, as these are insufficient to warrant an in-camera review of documents withheld on a claim of attorney-client privilege.

3. Description and Justification: - The Plaintiff will describe the materials for which in camera treatment is sought, provide reasons for granting such status, specify the time for which in camera treatment is sought for each document, and attach as exhibits the specific documents for which in camera treatment is sought.

Conclusion: The Plaintiff is fully aware of the legal standards required for filing a motion to seal and requesting an in-camera review within the jurisdiction of the 6th Circuit. The Plaintiff will provide compelling reasons and specific explanations justifying the sealing of the brief and the request for in camera review, along with evidence supporting a reasonable belief that such a review might yield evidence establishing the exception's applicability.

Signed and dated this 26th day of May 2024.

Respectfully submitted,



Ian Hunter Lucas
Plaintiff Pro Se
221 Charleston Avenue
Pleasant View, Tennessee, 37146
Phone: (910) 872-3577
Email: LucasIanHunter@outlook.com

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May 2024, the foregoing **MOTION** was filed with the Court's CM/ECF system, which automatically forwarded a copy to the following counsel of record:

Mark A. Baugh, BPR No. 015779
Denmark J. Grant, BPR No. 036808
BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.
1600 West End Avenue, Suite 2000
Nashville, Tennessee 37203
Telephone (615) 726-5600
Facsimile (615) 744-5760
Attorneys for Defendants Clairise Gamez, Crystal Ritchie, and Marissa Shulruff

Mark A. Baugh, BPR No. 015779
(See above for Address and Contact Information)
Attorney to be Noticed¹: Daniel Diermeier, Tracey George, Cybele Raver, Melanie Lowe, Timothy Garrett, Maja A. Hartzell, Ernie Rushing, Sara Donahoe, Terry Walker, K. Melissa Smith Hayes, Nancy Wise, Lacey Cross, Monika Do, Carrie Plummer, Ellen Schoen, Judson Smith, Jessica Wellette, Melanie Morris, Robingale Panepinto, Melissa Lord, Brittany Kirby, and Shannon Ellrich

Kevin C. Klein (#23301)
Jeffrey W. Sheehan (#33534)
KLEIN SOLOMON MILLS, PLLC
1322 4th Avenue North
Nashville, Tennessee 37208
(615) 600-4780
Attorneys for Defendants: Mary Ann Jessee, Michelle Tellock, Joel Newsome, Melissa Porter, G.L. Black, Neil Jamerson, Jeremy Bourgoin, Mavis Schorn, Pamela Jefferies, E. Jacob Cummings, Jill Harris, Heather Robbins, Cate Enstrom, Angela Weaver, Mary Roy, Michael Fazi, and Feylyn Lewis

Respectfully submitted,

/s/ Ian Hunter Lucas
Ian Hunter Lucas
Plaintiff Pro Se
221 Charleston Avenue
Pleasant View, Tennessee, 37146
Phone: (910) 872-3577
Email: LucasIanHunter@outlook.com

¹ This service has been executed through the court's Case Management/Electronic Case Files (CM/ECF) system, with Attorney Mark A. Baugh being designated as the "ATTORNEY TO BE NOTICED" on behalf of these defendants. It is important to note that this designation has been made notwithstanding the fact that a Federal Complaint or Federal Summons has not been formally served upon these defendants. This notice is issued to certify the completion of service as outlined above and to affirm the compliance with procedural requirements under the Federal Rules of Civil Procedure regarding the notification of defendants in this matter.